

# **EXHIBIT RRR**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3

4 SECURITIES AND EXCHANGE COMMISSION, )

5 Plaintiff, )

6 v. ) Case No.

7 BARRY C. HONIG, ROBERT LADD, ELLIOT ) 18 Civ. 8175 (ER)

8 MAZA, BRIAN KELLER, JOHN H. FORD, )

9 GRQ CONSULTANTS, INC., AND HS )

10 CONTRARIAN INVESTMENTS, LLC, )

11 Defendants. )

12 \_\_\_\_\_ )

13  
14 VOLUME 1

15 VIDEOTAPED DEPOSITION OF JOAN WU

16 VIA VIDEOCONFERENCE

17 Wednesday, June 22, 2022  
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24 Diversified Reporting Services, Inc.

25 (202) 467-9200

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2 SOUTHERN DISTRICT OF NEW YORK  
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9 GRQ CONSULTANTS, INC., AND HS )

10 CONTRARIAN INVESTMENTS, LLC, )

11 Defendants. )

12 \_\_\_\_\_ )  
13  
14

15 Videotaped deposition of Joan Wu,  
16 taken on behalf of the Plaintiff, all parties appearing  
17 remotely via Webex, beginning at 10:02 a.m. EST and  
18 ending at 12:14 p.m. EST, on Wednesday, June 22, 2022.  
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24 Diversified Reporting Services, Inc.

25 (202) 467-9200

1 APPEARANCES:

2  
3 On behalf of the Securities and Exchange Commission:

4 NANCY A. BROWN, ESQ.

5 JACK KAUFMAN, ESQ.

6 Securities and Exchange Commission

7 Division of Enforcement

8 100 Pearl Street, Suite 20-100

9 New York, New York 10004

10  
11 On behalf of the Witness:

12 MARK DAVID HUNTER, ESQ.

13 Hunter Taubman Fischer & Li LLC

14 48 Wall Street, Suite 1100

15 New York, New York 10005

16  
17 On behalf of Mr. Ladd:

18 ADAM FORD, ESQ.

19 ANJULA PRASAD, ESQ.

20 Ford O'Brien Landy LLP

21 275 Madison Avenue, Floor 24

22 New York, New York 10016

23  
24 Also Present:

25 Robert Ladd

1 Q Was it Mr. Kesner?

2 A Might be.

3 Q How about --

4 A I --

5 Q Oh, sorry. Were you finished?

6 A Yes.

7 Q How about Avital Perlman?

8 A Avital -- I remember, I was working on Avital,  
9 a transaction. I don't -- I don't remember which partner  
10 was supervising that project.

11 Q Did she work for one partner more than others  
12 as far as you knew?

13 A I -- I don't -- I don't remember.

14 Q All right. And so, in connection with being  
15 assigned to the MGT transaction, did Mr. Kaplowitz  
16 introduce you to Mr. Ladd?

17 A Yes.

18 Q What was Mr. Kesner's role in the transaction?

19 A I recall he represented the investor in -- in  
20 MGT.

21 Q And who was that?

22 A Barry Honig and some other people.

23 Q Was one of the other people John O'Rourke?

24 A I don't remember.

25 Q And did you have an understanding when you

1 first started working on MGT that Mr. Kesner had  
2 represented Mr. Honig in other transactions?

3 A I don't remember exactly.

4 Q Well, what do you remember generally?

5 A Generally, I knew -- I think Mr. Kaplowitz told  
6 me, or someone told me Mr. Kesner has represented Mr.  
7 Honig for a while.

8 Q And prior to the D-Vasive transaction, had you  
9 ever worked on any transactions with Mr. Kesner?

10 A I don't remember.

11 Q Did you subsequently? Did you ever work with  
12 Mr. Kesner?

13 A Yes, I did. There was -- I think I helped one  
14 of his clients in -- in the shelf takedown transaction,  
15 but I don't remember which client is that.

16 Q Was that the only transaction you worked on  
17 with Mr. Kesner while you were at Sichenzia?

18 A I don't remember. But overall, very few.

19 Q What, if anything, did you know about Barry  
20 Honig besides the fact that he may have been a client of  
21 Mr. Kesner's?

22 A I -- I heard from some other attorneys that he  
23 is a pretty active investor in the microcap space.

24 Q Anything else?

25 A No.